

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Michael A. Hammer
	:	
v.	:	Mag. No. 25-10113
	:	
BENI ALEMAN,	:	CRIMINAL COMPLAINT
a/k/a "Beni Lacatusu"	:	


I, Sean Battles, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

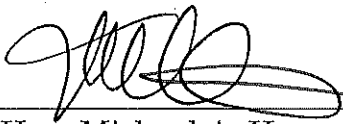
**SEE ATTACHMENT A**

I further state that I am a Deportation Officer with the United States Department of Homeland Security – U.S. Immigration and Customs Enforcement, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Sean Battles  
Deportation Officer  
U.S. Department of Homeland  
Security, U.S. Immigration and  
Customs Enforcement

  
\_\_\_\_\_  
Hon. Michael A. Hammer  
United States Magistrate Judge

4/28/2025

**ATTACHMENT A**

**(Illegal Reentry)**

On a date before April 19, 2025, in the District of New Jersey, and elsewhere,  
the defendant,

**BENI ALEMAN,  
a/k/a “Beni Lacatusu,”**

being an alien who was deported and removed and having departed from the United States while an order of deportation and removal was outstanding, and without the express consent of the Secretary of Homeland Security or Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States, did knowingly and voluntarily enter and, on or about April 19, 2025, was found in the United States.

In violation of Title 8, United States Code, Section 1326(a).

## ATTACHMENT B

I, Sean Battles, am a Deportation Officer with the Department of Homeland Security, Immigration and Customs Enforcement ("ICE"). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including documents and physical evidence. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint, the defendant, Beni Aleman, a/k/a "Beni Lacatusu ("ALEMAN"), was a native and citizen of Romania and was not a citizen of the United States.

2. On or about February 8, 2019, ALEMAN was ordered removed from the United States following the denial of an application for asylum and withholding of removal, which had been filed on June 11, 2018. Thereafter, ALEMAN was arrested in or around Wrens, Georgia, on or about February 22, 2019, for driving without a valid license, and was thereafter arrested in or around Saratoga Springs, Utah, on or about May 24, 2019, for theft by receiving stolen property and theft by deception. Thereafter on or about May 24, 2019, ICE officials in Salt Lake City, Utah, administratively arrested ALEMAN, at which time he was processed as a final order of removal and detained.

3. On or about June 21, 2019, ALEMAN was removed from the United States. Prior to this removal, an ICE official obtained ALEMAN's fingerprint.

4. At some point after his June 21, 2019 removal from the United States, ALEMAN re-entered the United States without permission from either the Attorney General or the Secretary of Homeland Security.

5. On or about November 9, 2024, ALEMAN was arrested in or around Upper Saddle River, New Jersey and charged with multiple counts of hindering, in violation of N.J.S.A. 2C:29-3A(4), N.J.S.A. 2C:29-3A(3), and N.J.S.A. 2C:29-3B(1). On or about that same date, the Montvale Police Department in Montvale, New Jersey, filed additional charges against ALEMAN for conspiracy to commit identity impersonation, credit card theft, and credit card fraud.

6. The following day, on or about November 10, 2024, ALEMAN was arrested in or around Middletown, New Jersey, and charged with, among other

offenses, theft by deception, in violation of N.J.S.A. 2C:20-4 and credit card theft — fraudulent use, in violation of N.J.S.A. 2C:21-6H. On or about that same date, the Mount Laurel Police Department in Mount Laurel, New Jersey, filed additional charges against ALEMAN for, among other offenses, computer crimes, in violation of N.J.S.A. 2C:20-25C, theft by deception, in violation of N.J.S.A. 2C:20-4, and identity-crime impersonation, in violation of 2C:21-17A(1). ALEMAN was adjudged guilty of theft by deception, in violation of N.J.S.A. 2C:20-4, and is currently pending sentencing.

7. In or around November 2024, the Middletown Police Department, the Ocean Township Police Department, and the Wall Township Police Department each filed additional charges against ALEMAN for theft- and deception-related crimes. On or about March 3, 2025, ALEMAN pled guilty in the Superior Court of New Jersey, Monmouth County, to three counts of credit card theft, in violation of N.J.S.A. 2C:21-6H, and one count of credit card theft, in violation of N.J.S.A. 2C:21-6C(1). On or about April 17, 2025, ALEMAN was sentenced to time served, which reflected 159 days of confinement, and a one-year term of probation. He was also ordered to pay restitution.

8. On or about April 19, 2025, ICE officials administratively arrested ALEMAN in Upper Saddle River, New Jersey, at which time he was fingerprinted. At that time, ICE officers served ALEMAN with a Notice of Intent/Decision to Reinstate Prior Order of Removal. A visual fingerprint analysis revealed that ALEMAN, who was arrested on April 19, 2025, is the same person who was removed from the United States on or about June 21, 2019.

9. A review of relevant databases revealed that neither the Secretary of Homeland Security nor the Attorney General expressly consented to ALEMAN reapplying for admission to the United States before his reembarkation at a place outside the United States, or his reentry into the United States.